

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ARRIVALSTAR S.A.)	
)	
and)	Case No.:
)	
MELVINO TECHNOLOGIES LIMITED,)	JUDGE:
)	
Plaintiffs,)	
v.)	
)	ORIGINAL COMPLAINT AND
GREATER CLEVELAND REGIONAL)	JURY DEMAND
TRANSIT AUTHORITY,)	
)	
Defendant.)	
)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs ArrivalStar S.A. and Melvino Technologies Limited (collectively, “ArrivalStar” or “Plaintiffs”), by and through their undersigned attorneys, for their complaint against defendant Greater Cleveland Regional Transit Authority (“RTA”) (RTA is referred to herein as “Defendant”) hereby allege as follows:

NATURE OF LAWSUIT

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

THE PARTIES

2. ArrivalStar S.A. is a corporation organized under the laws of Luxembourg and having offices at 67 Rue Michel, Welter L-2730, Luxembourg.

3. Melvino Technologies Limited is a corporation organized under the laws of the British Virgin Island of Tortola, having offices at P.O. Box 3152, RG Hodge Building, Road Town, Tortola, British Virgin Islands.

4. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,317,060 (“the ‘060 patent”), entitled “ Base station system and method for monitoring travel of mobile vehicles and communicating notification messages,” issued November 13, 2001. A copy of the ‘060 patent is annexed hereto as Exhibit A.

5. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 6,741,927 (“the ‘927 patent”), entitled “User-definable communications methods and systems,” issued May 25, 2004. A copy of the ‘927 patent is annexed hereto as Exhibit B.

6. ArrivalStar owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 7,030,781 (“the ‘781 patent”), entitled “Notification system and method that informs a party of vehicle delay,” issued April 18, 2006. A copy of the ‘781 patent is annexed hereto as Exhibit C.

7. Defendant RTA is a public transit authority formed, organized and operating pursuant to the laws of the State of Ohio with a place of business at 1240 West 6th Street, Cleveland, Ohio 44113. RTA transacts business and has, at a minimum, offered to provide and/or provided in this judicial district and throughout the State of Ohio services that infringe claims of the '060, '927 and '781 patents.

8. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

DEFENDANT RTA'S ACTS OF PATENT INFRINGEMENT

9. Defendant RTA has infringed claims of the '060, '927 and '781 patents through, among other activities, the use and sale of RTA's alert notification system.

10. Defendant RTA's infringement has injured and will continue to injure ArrivalStar unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of methods and systems that come within the scope of the '060, '927 and '781 patents.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs ask this Court to enter judgment against the Defendant, and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

A. An award of damages adequate to compensate ArrivalStar for the infringement that has occurred, together with prejudgment interest from the date that Defendant's infringement of the ArrivalStar patents began;

B. Increased damages as permitted under 35 U.S.C. § 284;

C. A finding that this case is exceptional and an award to ArrivalStar of its attorneys' fees and costs as provided by 35 U.S.C. § 285;

D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the ArrivalStar patents; and

E. Such other and further relief as this Court or a jury may deem proper and just.

Respectfully submitted,

Dated: February 28, 2012

/s/ Philip J. Moy Jr.
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**Attorneys for Plaintiffs
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Melvino Technologies Limited**

JURY DEMAND

ArrivalStar demands a trial by jury on all issues presented in this Complaint.

Respectfully submitted,

Dated: February 28, 2012

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